

# EXHIBIT 1

Jack Siemiatycki, Ph.D.

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SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

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LORI OULES, )  
 ) Judge Brian Holeman  
 )  
Plaintiff, ) Civil Action No.  
 )  
 ) 2014 CA 088327 B  
vs. )  
 )  
 )  
JOHNSON & JOHNSON, et al., )  
 )  
 )  
Defendants. )  
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--- This is the transcript of the deposition of  
JACK SIEMIATYCKI, Ph.D, taken at 850 St. Denis  
Street, Montreal, Quebec, on the 15th day of  
December, 2016.

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REPORTED BY: HELEN MARTINEAU  
CERTIFIED SHORTHAND REPORTER

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1 A P P E A R A N C E S:

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1 A P P E A R A N C E S: (continued)

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1 A P P E A R A N C E S: (continued)

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1 BY MR. HEGARTY:

2 Q. Your CV refers to receiving grant  
3 money for a "modifiable and genetic factors for  
4 the risk of ovarian cancer study" to look at those  
5 in Quebec. Are you aware of that study being  
6 done and the grant money being provided?

7 A. Yes.

8 Q. That study is "Prevention of Ovarian  
9 Cancer in Quebec PRO VAQ study"?

10 A. Yes.

11 Q. And it's characterized as a  
12 case-control study of modifiable and genetic risk  
13 factors associated with the risk of ovarian  
14 cancer, is that correct?

15 A. That's correct.

16 Q. You were on that study?

17 A. I'm a co-investigator. My role has  
18 been to be a mentor to a junior colleague who is  
19 the principal investigator of that study whose  
20 idea it was to help her obtain funding to provide  
21 some -- initially to provide some guidance on  
22 study design and to provide access to people in my  
23 research team who have expertise in running the  
24 field work of such epidemiologic studies.

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1 Q. Let me show you a printout as it  
2 relates to that study from your website. It's an  
3 exhibit I've marked as Exhibit number 13.

4 EXHIBIT NO. SIEMIATYCKI 13: Document  
5 titled "Currently funded research and  
6 collaborations involving members of the  
7 group".

8 BY MR. HEGARTY:

9 Q. And it is a printout of "Currently  
10 funded research and collaborations involving  
11 members of the group" and you're listed as the  
12 chair of that group.

13 A. Yes.

14 Q. If you turn over to page 4 of 6 we  
15 see the title of that study in the lower half of  
16 that paper, correct?

17 A. Correct.

18 Q. About two thirds of the way down the  
19 summary of that study says, "Established  
20 preventative factors for ovarian cancer include  
21 high parity, long duration of lactation, oral  
22 contraceptive use and tubal ligation." Do you  
23 agree that those are established preventative  
24 factors?

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1 A. Sorry, which line?

2 Q. About the middle where it says  
3 "established preventative factors". Do you agree  
4 that those are established preventative factors?

5 A. Yes.

6 Q. If you skip over the next line and  
7 go to the next one it says:

8 "There is suggestive evidence that  
9 modifiable factors in the vitamin D  
10 pathway, (sun exposure diet) and  
11 inflammation pathway (anti-inflammatory  
12 medication use, talc use for feminine  
13 hygiene) may play a role in ovarian  
14 cancer risk. Though this research has  
15 been limited by small sample sizes,  
16 crude exposure measurement and lack of  
17 control for important confounders."

18 That's what that says, correct?

19 A. Correct.

20 Q. So with regard to potential  
21 modifiable factors such as talc use for feminine  
22 hygiene that sentence is saying that it's -- there  
23 is suggestive evidence that it may play a role in  
24 ovarian cancer, correct?



1 MS. PARFITT: Objection, form.

2 THE DEPONENT: That -- sorry, that what?

3 BY MR. HEGARTY:

4 Q. The sentence that I just read if we  
5 break it down to talc it says there is suggestive  
6 evidence that talc used for feminine hygiene may  
7 play a role in ovarian cancer risk, correct?

8 A. Yes, it says that.

9 MS. PARFITT: Objection.

10 BY MR. HEGARTY:

11 Q. And it also says that the evidence,  
12 that suggestive evidence, the research on that has  
13 been limited by small sample sizes, crude exposure  
14 measurement and lack of control for important  
15 confounders, correct?

16 A. Correct.

17 Q. That sentence applies to all of the  
18 potential modifiable factors in this sentence,  
19 correct?

20 A. Yes.

21 Q. Including talc?

22 A. The grammatical structure of that  
23 sentence would imply what you say.

24 Q. This is a study that's looking at

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1 talc use and ovarian cancer, correct?

2 A. Among other things.

3 Q. And certainly it's -- strike that.

4 In presenting the grant request for this  
5 study you didn't state that talc use had been  
6 established as a cause of ovarian cancer, correct?

7 MS. PARFITT: Objection, form.

8 THE DEPONENT: Correct.

9 BY MR. HEGARTY:

10 Q. Where does this study stand?

11 A. So to explain the context of this  
12 study and of this paragraph that you read, it was  
13 somewhere around 2008 or so that my colleague,  
14 Anita Koushik, started working on the idea for  
15 this study. And she -- I imagine that this  
16 paragraph has been around since the beginning,  
17 around 2008, 2009. This was the period of the  
18 first grant application.

19 There was a pilot study that was funded  
20 that lasted a year or two; and then she was  
21 successful in getting funding for a larger study;  
22 and then we got funding to extend it further.

23 The study now has nearly been completed  
24 or it's on the point of being completed in terms

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1 of the field work. Maybe it is completed.

2 After the first few years of helping her  
3 to get started and establish herself as a new  
4 researcher in this milieu, and getting familiar  
5 with how to get funds and this sort of thing, I  
6 kind of retreated into the background of the  
7 process. And she has been running it with help  
8 from some of the people in my own research team  
9 for these years.

10 I think it's now complete but it might  
11 be a couple of months away from being completed,  
12 the field work. They've started analyzing some of  
13 the wealth of information that they collected.  
14 They may have -- I don't think that they have  
15 touched the talc variables at all. I certainly  
16 haven't heard anything about analyses or results  
17 concerning talc and ovarian cancer. They're  
18 starting with some of the variables around  
19 reproductive factors and looking at associations  
20 there with ovarian cancer.

21 This website that you got this off of is  
22 our team website, but I really don't have anything  
23 to do with it. I let other people put their  
24 projects and their text on to it, and I'm pleased

1     that Anita has done this and has this description  
2     of the project. The description is now many years  
3     old. It's from the time before the fund -- the  
4     field work started. So it would be, I'm guessing,  
5     the years 2008, 2009. It's not a publication. I  
6     don't monitor what's there. So that's really  
7     where things are at.

8                 Q. You're listed in the summary as the  
9     second researcher on this paper.

10                A. Yeah. I think I've been listed -- I  
11     think this group has been listed as it is for six  
12     or seven years in various iterations of grant --  
13     obtaining grants.

14                Q. Are you still an advisor on this  
15     study?

16                A. I expect that when the time comes to  
17     writing articles or -- and reviewing the data and  
18     interpreting it I expect that at that point I will  
19     be asked to participate. I haven't participated  
20     really for about four years, four or five years at  
21     all. The last participation was probably around  
22     2012 with a grant application at that time.

23                So it's bit of an elastic concept to ask  
24     if I participate. I haven't actively done

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1 anything about it but I probably will again in the  
2 future.

3 Q. You mentioned another grant  
4 application I think you received in 2012 where  
5 this same description had been used for that grant  
6 application?

7 A. Could very well be. If you can  
8 point me to the thing I can confirm it, but I  
9 think it was 2012 that we got the last big grant  
10 application for this project.

11 Q. Have you stepped in and advised with  
12 regard to the talc component of this study?

13 A. Not really. And I do know that the  
14 talc component of the questionnaire was a very  
15 detailed one. And I frankly don't recall what  
16 role I played, if any, in devising the  
17 questionnaire for the talc questions. I'm  
18 inclined to believe that it's as good as it is  
19 because I didn't have much of a role in it and the  
20 others just did a job with it.

21 Q. You agree that the issue of talc and  
22 ovarian cancer is still an area worth studying  
23 with epidemiologic studies?

24 MS. PARFITT: Objection, form.

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1 THE DEPONENT: Absolutely, yes. Just as  
2 smoking and cancer is still an area worth studying  
3 for various reasons.

4 BY MR. HEGARTY:

5 Q. One of the sponsors of your research  
6 group is the Canadian Cancer Society, is that  
7 correct?

8 A. For this project? Or when you say  
9 "my group"?

10 Q. Generally. Strike that, let me ask  
11 it another way.

12 What relationship does your group or you  
13 have individually with the Canadian Cancer  
14 Society?

15 A. Now I don't have any relationship  
16 with it. I've had quite a few grants from them,  
17 from that agency in the past and I was on the  
18 Board of Directors for a few years.

19 Q. What years were you on the Board of  
20 Directors?

21 A. Somewhere around 2000 to 2008 maybe,  
22 somewhere in that ball park. But it could be -- I  
23 could be off by a few years. They've changed  
24 names. The Canadian Cancer Society is equivalent

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1 REPORTER'S CERTIFICATE

2

3 I, HELEN MARTINEAU, CSR, Certified  
4 Shorthand Reporter, certify;

5 That the foregoing proceedings were  
6 taken before me at the time and place therein set  
7 forth at which time the witness was put under oath  
8 by me;

9 That the testimony of the witness and  
10 all objections made at the time of the examination  
11 were recorded stenographically by me and were  
12 thereafter transcribed;

13 That all quotes were inserted as read:

14 That the foregoing is a true and  
15 accurate transcript of my shorthand notes so  
16 taken. Dated this 30th day of December, 2016.

17

18

19

20 PER: HELEN MARTINEAU

21 CERTIFIED SHORTHAND REPORTER.

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